

Gerard Poliquin  
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Sent electronically to: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)  
Re: RIN. 3133-AE45

May 04, 2015

Dear Mr. Poliquin:

On behalf of the credit unions in the state of Iowa, I appreciate the opportunity to comment on the National Credit Union Administration (NCUA) proposed rule and Interpretive Ruling and Policy Statement (IRPS) to increase the asset threshold used to define a small entity under the Regulatory Flexibility Act of 1980 (RFA) from \$50 million to \$100 million. The Iowa Credit Union League (ICUL) is in favor of NCUA rulemakings which aims to provide smaller credit unions, who pose less risk to the Share Insurance Fund, with regulatory relief so they can focus on serving their members.

ICUL strongly supports the NCUA proposal to increase the asset threshold for small entities and believes there are reasons to set the asset threshold level even higher than \$100 million. Iowa credit unions with assets less than \$100 million are often at a competitive disadvantage, but nevertheless they maintain an important role within the credit union industry. ICUL believes the increased small entity threshold will account for and benefit these credit unions which generally face significant challenges, specifically from their relatively small asset base, ongoing regulatory burden, and economies of scale.

Once the threshold increase is finalized, 11 additional Iowa credit unions will benefit from reduced regulatory compliance requirements or exemptions through RFA analysis during NCUA rulemaking. The opportunity for additional Iowa credit unions to comment on potential economic impacts and alternatives during the rulemaking process will benefit Iowa credit unions and members alike.

ICUL appreciates the NCUA's consideration of a small credit union's ability to handle ongoing compliance burdens and address significant challenges due to future rulemaking. Iowa credit unions eagerly await the prospective relief which will result from the increased asset threshold for small entities. ICUL encourages the NCUA to continue exploring opportunities to relieve all credit unions of additional compliance burdens in order to devote further resources to serving their members.

Sincerely,



Patrick S. Jury  
CEO/President  
Iowa Credit Union League

